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9  
10 Attorney for Defendant  
11 GAL YIFRACH

12  
13 IN THE UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 CASE NO. 2:22-CR-00046 WBS

17 Plaintiff,

18 STIPULATION CONTINUING STATUS  
19 CONFERENCE TO AUGUST 15, 2022, AT 9:00  
20 A.M. AND FOR EXCLUDABLE TIME PERIODS  
21 UNDER SPEEDY TRIAL ACT AND [PROPOSED]  
22 ORDER

v.

23 GAL YIFRACH, et al.,

24 Defendant.

25  
26 **STIPULATION**

27 Plaintiff United States of America, by and through its counsel of record, and defendants, by and  
28 through their counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference before this Court on  
May 9, 2022.

2. By this stipulation, the defendants now move to continue this status conference and set a  
status conference for August 15, 2022, and to exclude time between May 9, 2022, and August 15, 2022,  
at 9:00 a.m., under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced 142,689 pages of numbered discovery to  
defendants, which includes copies of documents and recordings; and, the government is in the  
process of reviewing additional materials for production in discovery consisting of a number of

1 electronic devices seized including phones, laptops and various external storage devices, as well  
2 as email accounts.

3 b) Counsel for each defendant desires additional time to familiarize themselves with  
4 the case and review the voluminous discovery, discuss the case with their respective clients and  
5 the attorney for the United States, and otherwise prepare for trial.

6 c) Counsel for the defendants believes that failure to grant the above-requested  
7 continuance would deny them the reasonable time necessary for effective preparation, taking into  
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the  
11 case as requested outweigh the interest of the public and the defendants in a trial within the  
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14 et seq., within which trial must commence, the time period of May 9, 2022, to August 15, 2022,  
15 at 9:00 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)  
16 [Local Code T4] because it results from a continuance granted by the Court at the defendants'  
17 request on the basis of the Court's finding that the ends of justice served by taking such action  
18 outweigh the best interest of the public and the defendants in a speedy trial.

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1           4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
3 must commence.

4           IT IS SO STIPULATED.

5           Dated: May 2, 2022

PHILLIP A. TALBERT  
United States Attorney

7           \_\_\_\_\_  
8           /s/ ROGER YANG  
9           ROGER YANG  
10           Assistant United States Attorney

11           IT IS SO STIPULATED BY ALL DEFENDANTS.

12           Dated: May 2, 2022

13           \_\_\_\_\_  
14           /s/ DAVID W. DRATMAN  
15           DAVID W. DRATMAN  
16           Counsel for Defendant GAL YIFRACH

17           Dated: May 2, 2022

18           \_\_\_\_\_  
19           /s/ MALCOLM S. SEGAL  
20           MALCOLM S. SEGAL  
21           Counsel for Defendant  
22           SCHNEUR ZALMAN GETZEL ROSENFELD

23           Dated: May 2, 2022

24           \_\_\_\_\_  
25           /s/ DAVID E. KENNER  
26           DAVID E. KENNER  
27           Counsel for Defendant  
28           SHALOM IFRACH

1           Dated: May 2, 2022

2           \_\_\_\_\_  
3           /s/ VICTOR SHERMAN  
4           VICTOR SHERMAN  
5           Counsel for Defendant  
6           NICK SHKOLNIK

7           **[PROPOSED] ORDER**

8           IT IS SO FOUND AND ORDERED this \_\_\_\_ day of May, 2022.

9           \_\_\_\_\_  
10           THE HONORABLE WILLIAM B. SHUBB  
11           SR. UNITED STATES DISTRICT JUDGE